

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:	)	Case No:	18-16141
Micheal Theige	)		
Linda Ann Theige	)	Chapter:	Chapter 13
Debtors	)		
	)	Judge:	Pamela S. Hollis

NOTICE OF MOTION

To: Micheal & Linda Theige, 528 Douglas St, Morris, IL, 60450  
Glenn B. Stearns, 801 Warrenville Rd. Suite 650, Lisle, IL, 60532  
Office of the US Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

**PLEASE TAKE NOTICE** that on **May 10, 2019 at 10:45 a.m.** I shall appear before the Honorable Judge **Pamela S. Hollis** at Joliet City Hall, 150 W. Jefferson St. 2nd Floor, Joliet IL 60432 and then and there present the attached **MOTION TO MODIFY CONFIRMED PLAN**, a copy of which is attached hereto.

By: /s/ Briana Czajka  
Briana Czajka

CERTIFICATE OF SERVICE

I, Briana Czajka, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, on 4/19/2019.

By: /s/Briana Czajka  
Briana Czajka

Attorneys for the Debtors

Geraci Law L.L.C.  
55 E. Monroe Street #3400  
Chicago, Illinois 60603  
(Ph): 312.332.1800 (Fax): 877.247.1960

American Web Loan  
2128 N 14th St  
Ste 1, #130  
Ponca City OK 74601

AmeriCash Loans  
Bankruptcy Department  
880 Lee St., Ste. 302  
Des Plaines IL 60016

ATT U-Verse  
C/O Diversified Consultant  
10550 Deerwood Park Blvd  
Jacksonville FL 32256

BANK OF Pontiac  
Attn: Bankruptcy Dept.  
300 W Washington St  
Pontiac IL 61764

CAP1/Mnrds  
Attn: Bankruptcy Dept.  
26525 N Riverwoods Blvd  
Mettawa IL 60045

Chase CARD  
Attn: Bankruptcy Dept.  
Po Box 15298  
Wilmington DE 19850

COMENITY BANK/Carsons  
Attn: Bankruptcy Dept.  
Po Box 182789  
Columbus OH 43218

Comenitybank/Chrisbank  
Attn: Bankruptcy Dept.  
Po Box 182789  
Columbus OH 43218

Comenitycb/ULTA  
Attn: Bankruptcy Dept.  
Po Box 182120  
Columbus OH 43218

Credit ONE BANK NA  
Attn: Bankruptcy Dept.  
Po Box 98875  
Las Vegas NV 89193

Illinois State Credit  
Attn: Bankruptcy Dept.  
1309 S Center St  
Normal IL 61761

Illinois State Credit  
Attn: Bankruptcy Dept.  
1309 S Center St  
Normal IL 61761

Jeanette Dinelli  
214 E North St  
Dwight IL 60420

Kohls/Capone  
Attn: Bankruptcy Dept.  
N56 W 17000 Ridgewood Dr  
Menomonee Falls WI 53051

Lending Tree  
40 Skokie Blvd  
Northbrook IL 60062

Loancare Servicing CTR  
Attn: Bankruptcy Dept.  
3637 Sentara Way  
Virginia Beach VA 23452

Maxlend  
PO Box 639  
Parshall ND 58770

MBB  
Attn: Bankruptcy Dept.  
1460 Renaissance Dr  
Park Ridge IL 60068

Payday Loans Inc.  
Bankruptcy Department  
8832 S. Cicero Ave.  
Oak Lawn IL 60453

RAC Acceptance  
Bankruptcy Department  
15770 S. LaGrange Rd.  
Orland Park IL 60462

Rushmore  
1023 W lake St  
Chicago IL 60607

Security Finance  
Attn: Bankruptcy Department  
3618 E. State St.  
Rockford IL 61108

State Collection Servi  
Attn: Bankruptcy Dept.  
2509 S Stoughton Rd  
Madison WI 53716

Syncb/Walmart  
Attn: Bankruptcy Dept.  
Po Box 965024  
Orlando FL 32896

Synchrony BANK  
C/O Midland Funding  
2365 Northside Dr Ste 30  
San Diego CA 92108

WF BANK NA  
Attn: Bankruptcy Dept.  
Po Box 14517  
Des Moines IA 50306

World Finance Corporat  
Attn: Bankruptcy Dept.  
108 Frederick St  
Greenville SC 29607

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

<b>In Re:</b> <b>Micheal Theige</b> <b>Linda Ann Theige</b> <b>Debtors</b>	) ) ) ) )	<b>Case No: 18-16141</b>  <b>Chapter: Chapter 13</b>  <b>Judge: Pamela S. Hollis</b>
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**MOTION TO MODIFY CONFIRMED PLAN**

NOW COME the Debtors, Mr. & Mrs. Micheal Theige (the “Debtors”), by and through their attorneys, Geraci Law L.L.C., to present their **MOTION TO MODIFY CONFIRMED PLAN**, and state as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b)(2).
2. The Debtors filed their Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 06/05/2018.
3. The Debtors’ plan was confirmed by the Court on 09/07/2018.
4. The Debtors fell behind on their Chapter 13 plan payments because Mr. Theige had a stroke and retired and could not afford plan payments because he did not immediately start receiving his social security and pensions.
5. Mr. Thiege is now receiving income and the Debtors are able to resume plan payments, however they are unable to cure the default. See Exhibit A for an updated budget.
6. For the reasons stated above, it is necessary for the successful completion of the Debtors’ plan to defer the arrears to the end of the plan term.

Honorable Court enter an order:

1. Deferring arrears to the end of the plan term,
2. Any other relief the court deems proper.

By: /s/ Briana Czajka  
Briana Czajka

**Attorneys for the Debtors**

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960